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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RATIEK LOWERY, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

PERRY JOHNSON & ASSOCIATES, INC.

and

NORTHWELL HEALTH, INC.,

Defendants.

CASE NO.: 2:23-cv-01857

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF RATIEK LOWERY'S
COMPLAINT**

FIRST REQUEST

Plaintiff Ratiek Lowery, individually and on behalf of all others similarly situated, ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiff filed the Complaint on November 13, 2023 and served Northwell on November 16, 2023 and PJ&A on November 15, 2023, respectively.

On December 8, 2023, Plaintiff filed a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C. § 1407 (the "Motion") in the Judicial Panel on Multidistrict Litigation

1 (“JPML”). *See In re Perry Johnson & Associates Medical Transcription Data Security Breach*
2 *Litigation*, Case MDL No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the
3 potential consolidation and transfer of at least forty-five related putative class action complaints.
4 The JPML heard oral arguments on the Motion on January 25, 2024.

5 Defendants’ individual responses are currently due by January 29, 2024.

6 This extension is necessary to allow the JPML sufficient time to evaluate the various related
7 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
8 included as Appendix A. As nearly every party—including Plaintiff and Defendants—has agreed
9 that centralization is proper, the primary question for the JPML is *where* to centralize the cases, not
10 *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline. The parties respectfully submit that there is good cause for this extension
13 and the requested extension is not for the purpose of delay.

14 ///

15 ///

16 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER LLP

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Dated: January 26, 2024.

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Dated: January 26, 2024.

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*Counsel for Defendant Perry Johnson &
Associates, Inc.*

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Defendants shall have up to and including **March 1, 2024** to respond to Plaintiff's complaint.

IT IS SO ORDERED.



Nancy J. Koppe
United States Magistrate Judge

Dated: January 29, 2024